

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
UNITED STATES OF AMERICA	:	
	:	No. 22-CR-240 (AKH)
- v. -	:	
	:	
SUNG KOOK (BILL) HWANG and	:	
PATRICK HALLIGAN,	:	
	:	
Defendants.	:	
-----X	:	

**DEFENDANT PATRICK HALLIGAN’S
NOTICE OF MOTION TO EXCLUDE PROPOSED
EXPERT TESTIMONY OF ROBERT BATTALIO,
AMIT SERU, CARMEN TAVERAS, AND JOSEPH MASON**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated March 21, 2024; the Declaration of Mary E. Mulligan, dated March 21, 2024, and the exhibits annexed thereto; and all other papers and proceedings herein, Defendant Patrick Halligan, by and through his counsel, hereby moves this Court, before the Honorable Alvin K. Hellerstein, at a date and time to be set by the Court, at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 706, New York, New York 10007, for an Order (1) instructing the government that it may not present the same opinion or testimony from multiple experts, encompassing all topics of expert opinion and testimony; and (2) granting relief to the same and full extent set forth in defendant Sung Kook (Bill) Hwang’s motion to exclude certain of the anticipated testimony and opinions of the government’s proposed experts.

Dated: New York, New York
March 21, 2024

Respectfully Submitted,

FRIEDMAN KAPLAN SEILER
ADELMAN & ROBBINS LLP

s/ Mary E. Mulligan

Mary E. Mulligan (mmulligan@fklaw.com)
Timothy M. Haggerty (thaggerty@fklaw.com)
Bonnie M. Baker (bbaker@fklaw.com)
Anil Vassanji (avassanji@fklaw.com)
Rupita Chakraborty (rchakraborty@fklaw.com)
7 Times Square
New York, New York 10036-6516
(212) 833-1100

Attorneys for Patrick Halligan